Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

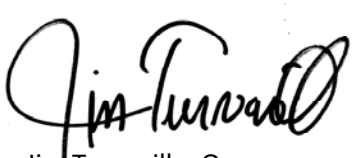
With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests review of language in 74.1231(b) to specify that FM translator stations can fed by alternative signal delivery means no matter the primary station or operating channel of the translator, with prescribed restrictions. Currently the Rule specifies that only *"An FM booster station or a noncommercial educational FM translator station that is operating on a reserved channel (Channels 201-220) and is owned and operated by the licensee of the primary noncommercial educational station it rebroadcasts may use alternative signal delivery means".* This has created a current existence of "national translator networks" of NCE licensees; and these regulations have served that section of licensees well. TTS requests that the language be amended to permit any non-fill in translator operating in any service (NCE or Commercial) fed by any Primary FM station (NCE or Commercial) to be alternately fed. This would be enacted with the existing policy that the translator be within a specified contour of the primary station, but eliminate the requirement for direct terrestrial reception. The use of direct terrestrial reception in all cases is not always a technical possibility, due to blanketing of FM receivers at the translator location, interference from other full-power stations in the proximity of the translator, or other terrain and signal interruptions. If the goal of FM translators is to serve a local area, then quality of audio is a direct path to that; expensive antenna and filters with poor audio does not serve to meet those goals. Modern technology permits such, if allowed by FCC Rules.

A thorough review of this technical restriction is hereby encouraged.

Respectfully Submitted



Jim Turvaville, Owner
Turbo Technical Services